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JOHN ASHCROFT
Governor

G. TRACY MEHAN III
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176
Jefferson City, MO 65102

~~Pat IV~~
file
Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

September 27, 1991

Mr. Lyndell Harrington, P.E.
Chief, RCRA Permits Section
Waste Management Division
US EPA Region VII
726 Minnesota Ave.
Kansas City, KS 66101

Dear Mr. Harrington:

The Missouri Department of Natural Resources (MDNR) has determined that the Safety-Kleen facility located in Brentwood, Missouri has closed in substantial accordance with its closure plan dated September 18, 1985. The enclosed memorandum serves as MDNR's acceptance of Safety-Kleen's certification of closure. MDNR believes that it has met the State-EPA Agreement requirement for this facility.

If you have any questions, please feel free to call me at (314) 751-3176.

Sincerely,

HAZARDOUS WASTE PROGRAM

Daniel M. Tschirgi

Daniel M. Tschirgi, P.E.
Chief, Hazardous Waste Permits Unit

DMT:trj

Enclosure

c: St. Louis Regional Office

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DEPARTMENT OF NATURAL RESOURCES

MEMORANDUM

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SEP 30 1991

PRMT SECTION

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

DATE: September 27, 1991

TO: Safety-Kleen, Brentwood TSD File

THROUGH: ^{DMT} Dan Tschirgi, P.E., Chief
Hazardous Waste Permits Unit, Hazardous Waste Program

FROM: ^{TR} Tom Ratermann, Environmental Engineer
Hazardous Waste Permits Unit, Hazardous Waste Program

SUBJECT: Safety-Kleen, Brentwood - Closure Plan

Upon review of the Safety-Kleen, Brentwood treatment, storage, and disposal (TSD) file and enforcement file, the Hazardous Waste Permits Unit has determined that the facility has closed in substantial accordance with the closure plan dated September 18, 1985. This determination is based upon a February 2, 1987 MDNR memorandum to the enforcement file, a January 9, 1987 Burns and McDonnell letter, a December 12, 1986 Laboratory Services Program (LSP) report, and a November 20, 1986 MDNR memorandum to the enforcement file.

The November 20, 1986 MDNR memorandum to the file documents a visit to the Safety-Kleen, Brentwood facility for the purpose of observing the closure and obtaining split samples. This memorandum states that, "The maximum area consistent with legal and safety considerations had been excavated." However, this memorandum does not explicitly state how the excavation spoil and the abandoned tanks were managed or how the excavation was backfilled.

The December 12, 1986 LSP report contains analyses for three (3) composite soil samples. These soil samples were split samples obtained from the excavation resulting from tank closure. These samples were obtained by Tom Judge of MDNR's Waste Management Program. These samples were analyzed for flash point and twenty-three (23) volatile organic compounds (VOC). All three (3) soil samples had flash points greater than sixty (60) degrees Celsius, therefore the material represented by these samples is not a D001 hazardous waste. Additionally, none of the twenty-three (23) VOC's were detected above detection limits.

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The January 9, 1987 Burns and McDonnell letter contains the "Professional Engineer Certification" signed and sealed by Harold Thomas Brown of Burns and McDonnell. This certification states that, "...closure of the Safety-Kleen Corporation Brentwood Service Center was in accordance with the "Closure Plan for Safety-Kleen Corporation-Brentwood, Missouri" as modified and approved by the Missouri Department of Natural Resources (DNR letters dated November 27, 1985 and December 16, 1985 and Safety-Kleen letter dated December 5, 1985). This certification is submitted pursuant to 10 CSR 25-7.265."

The February 2, 1987 MDNR memorandum to the enforcement file concludes that "there seems to be no reason to dispute the closure."

If any residual contamination at the facility exists it might be due to the sewer which was referenced in the November 20, 1986 MDNR memorandum to the enforcement file. This sewer along apparent bedrock subsequently collapsed during the sampling visit of November 18, 1986. Those samples that were obtained from the excavation walls during that sampling visit provide the best evidence that no further residual contamination remained in the site soils.

TR:js

c: Lynn Harrington, P.E., EPA Region VII
St. Louis Regional Office